

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

DANIELLE SPEARS,

Plaintiff,

v.

NEXT BRIDGE HYDROCARBONS, INC.,
GREGORY MCCABE, JOHN BRDA,
THE SECURITIES & EXCHANGE COMMISSION,
FINANCIAL INDUSTRY REGULATORY
AUTHORITY, and JANE DOE 1-20, JOHN DOE 1-20,

Defendants.

Case No.:
7:24-CV-321-RCG-DC

**DEFENDANT FINANCIAL INDUSTRY REGULATORY AUTHORITY, INC.’S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
REPLY BRIEF IN SUPPORT OF FINRA’S MOTION TO DISMISS
PLAINTIFF’S SECOND AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Financial Industry Regulatory Authority, Inc. (“FINRA”) files this UNOPPOSED Motion for Extension of Time until September 2, 2025 to file a Reply Brief in Support of FINRA’s Motion to Dismiss Plaintiff’s Second Amended Complaint (“Motion for Extension”), stating as follows in support:

1. Plaintiff Danielle Spears (“Plaintiff”) filed the Second Amended Complaint on March 14, 2025 [ECF Nos. 12-13].
2. FINRA filed its Motion to Dismiss the Second Amended Complaint on May 19, 2025 [ECF No. 42-1].

3. On July 28, 2025, the Court granted Plaintiff's Fourth Motion for Extension of Time to File a Response to FINRA's Motion to Dismiss ("Response"), thereby extending Plaintiff's deadline to respond until August 11, 2025 [ECF No. 62].

4. Absent an extension of time, FINRA's Reply Brief in Support of its Motion to Dismiss would be due on August 18, 2025. Due to scheduling conflicts and what FINRA anticipates will be a robust Response from Plaintiff, FINRA requests additional time until September 2, 2025 to file its Reply Brief.

5. FINRA has not previously sought any extensions in this matter and extending the deadline for FINRA to file its Reply Brief would not upset or require change to any pending deadlines.

6. Plaintiff consents to this extension of time.

WHEREFORE, FINRA respectfully moves for an extension of time to and including September 2, 2025, to file its Reply Brief in Support of its Motion to Dismiss Plaintiff's Second Amended Complaint.

Respectfully submitted,



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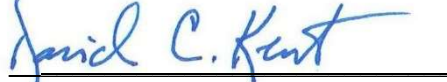
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Attorneys for Defendant

Financial Industry Regulatory Authority, Inc.

LOCAL RULE CV-7(G) CERTIFICATE OF CONFERENCE

On July 31, 2025, counsel for FINRA conferred with Plaintiff who stated he has NO OPPOSITION to any of the relief requested in this Motion.



David C. Kent

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served on all *pro se* parties and counsel of record through the CM/ECF system on August 4, 2025.